

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JASON FRY, individually and on behalf of all others similarly situated,

Plaintiff,

V.

PEOPLECONNECT, INC..

Defendant.

NO. 2:21-cv-01222-MJP

**JOINT MOTION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
DEFENDANT TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF's COMPLAINT**

**NOTE ON MOTION CALENDAR:
September 29, 2021**

PeopleConnect, Inc. (“Defendant”) and Jason Fry, on behalf of himself and all others similarly situated (“Plaintiff”), by and through their undersigned counsel, respectfully move for a thirty (30) day extension of time for Defendant to answer or otherwise respond to Plaintiff’s complaint. In support of this Motion, the Parties state as follows:

1. Plaintiff filed a class action complaint on September 7, 2021 (ECF No. 1).
2. Plaintiff served Defendant with the complaint on September 10, 2021 (ECF No. 4).

Accordingly, Defendant currently must answer or otherwise respond to Plaintiff's complaint by October 1, 2021.

JOINT MOTION AND [PROPOSED] ORDER TO EXTEND
DEADLINE FOR DEFENDANT TO ANSWER OR
OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT - 1
No. 2:21-cv-01222-MJP

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1 3. On September 22, 2021, Defendant's counsel sent a letter to Plaintiff's counsel
 2 stating that "Mr. Fry is a current member of Classmates.com and has been for more than 15 years,
 3 having created a Classmates account in 2004."
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5 4. On September 24, 2021, Plaintiff's counsel asked that Defendant's counsel
 6 "provide the information upon which you base this assertion, such as account details purportedly
 7 associated with Mr. Fry." In exchange for Defendant providing this information so that Plaintiff's
 8 counsel could verify it with Mr. Fry, Plaintiff's counsel agreed to an extension of time for
 9 Defendant to answer or otherwise amend.
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11 5. On September 24, 2021, Defendant's counsel provided the email address associated
 12 with an account Defendant states was created by Mr. Fry, along with screenshots depicting the
 13 profile on Classmates.com.
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15 6. To facilitate the parties' investigation of these issues, Defendant and Plaintiff agree
 16 to a thirty (30)day extension of time for Defendant to respond to Plaintiff's complaint, which would
 17 extend Defendant's time to respond to November 1, 2021.
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19 WHEREFORE, for the reasons stated herein, the Parties respectfully request that this
 20 Court grant this Motion and enter an Order extending the deadline for Defendant to respond to
 21 Plaintiff's complaint by thirty (30) days, up to and including November 1, 2021.
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1 DATED this 29th day of September, 2021.
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3 PEOPLECONNECT, INC.

JASON FRY

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Attorneys for Plaintiff Jason Fry

22 Attorneys for Defendant PeopleConnect, Inc.
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26 IT IS SO ORDERED.
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28 Marsha J. Pechman
29 U.S. District Judge
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31 DATE: _____, 2021
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